

**U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

D. GEORGE SWEIGERT	
Vs.	Case 1:18-cv-08653-VEC-SDA
JASON GOODMAN	VALERIE E. CAPRONI

DECLARATION OF PLAINTIFF TO SUPPORT AMENDED MOTION
FOR LIMITED REOPENING OF DISCOVERY
PURSUANT TO F.R.C.P. RULE 16(b) AND 56(d)

Respectfully,



D. George Sweigert
America's RV Mailbox
514 Americas Way, PMB 13339
Box Elder, SD 57719-7600
Email: SPOLIATION-NOTICE@MAILBOX.ORG

Signed this twenty ninth day of December 2021. Date 12/29/2021.

Respectfully,



D. George Sweigert
Veteran U.S. Air Force

CERTIFICATE OF SERVICE

The Plaintiff asserts under penalties of perjury that copies of these pleadings have been sent to Jason Goodman on 12/29/2021 at truth@crowdsourcethetruth.org

NOW COMES THE PLAINTIFF D. GEORGE SWEIGERT to provide this declaration pursuant to the Federal Rules of Civil procedure Rule 56(c) and Rule 56(d). This declaration is hereby provided under the penalties of perjury by the undersigned.

The intent of this declaration is to demonstrate that the Plaintiff can present evidence to the level of “actual malice” based on circumstantial evidence needed by the Plaintiff. The undersigned holds the belief that the Defendant is intentionally attempting to frustrate the collection of such evidence.

It is the belief of the undersigned that he needs to demonstrate with specificity a potential genuine material-fact dispute and show how the proposed discovery could lead to a genuine triable fact. It is the undersigned’s belief that this document accomplishes that requirement.

Signed this twenty ninth day of December 2021. Date 12/29/2021.

Respectfully,



D. George Sweigert
Veteran U.S. Air Force

CERTIFICATE OF SERVICE

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DISCOVERY MATERIALS NOT RECIEVED BY PLAINTIFF

As a preliminary matter the Plaintiff (undersigned) has not received any discovery materials from the Defendant since approximately May 2021. The discovery materials described by the Defendant in ECF no. 340 have not been received by the Plaintiff. At the discovery conference conducted by the Court on December 15, 2021 the Plaintiff recalls that the Defendant alluded to the possibility that he may have sent such materials to a previous address of the Plaintiff in Nevada City, California.

12/13/2021	340	LETTER addressed to Magistrate Judge Stewart D. Aaron from J. Goodman, dated 12/13/21 re: In the interest of judicial efficiency and compliance with existing orders, Defendant had not intended to discuss these discovery issues in additional pleadings, but rather to wait until the Discovery Conference on 12/15/21. However, the plaintiff's insistence on clogging the docket with frivolous and deceitful filings in his attempt to prejudice the Court's perspective now demands a response etc. Plaintiff has no compunctions about emailing Defendant almost daily to harass his elderly family members and engage in other forms of cyber harassment, but he did not mention that he failed to receive discovery materials until he filed his letter seeking sanctions with the Court etc. Document filed by Jason Goodman..(sc) (Entered: 12/14/2021)
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DISCOVERY MATERIALS NEEDED BY THE PLAINTIFF

The Plaintiff asserts in good faith that the following video productions are referenced in the document below. These video podcasts are needed by the Plaintiff to demonstrate “actual malice”.

#MAGA Bomber Goes Postal with Special Guest Lee Stranahan	20
April 7, 2018: Hack to the Future – Exploring the Sweigert, Hearst, Buffett Time Phones	12
August 17, 2018: The breakdown of the crew	13
Date unknown 2019: Red Line Death in Zulu Time Did Ramsey Use George Sweigert	
Patent to Call Police with David Hawkins	14
Date unknown. Michael Barden Targeted Individual.....	28
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January 29, 2019 Question for Legal Experts: Has D. George Sweigert Committed Mail	
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January 29, 2019: Michael Barden Targeted Individual – Results of Michael’s Sentencing	
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January 9, 2019: Michael Barden Targeted Individual – How to Survive an Economic	
Attack Designed to Disrupt Your Income.....	29
June 13, 2017: Live From the Capitol Building	37
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June 3, 2017: Who is Spoofing the #SethRichFiles	25
June 30, 2019: Robert David Steele’s #FakeLawsuit Gets Its Day in Court.....	24
May ?, 2018: The Trolls of Mt. Shasta.....	10
May 17, 2018: Larry Klayman on Mueller’s Conflicts of Interest with Special Guest Robyn Gritz.....	34
May 17, 2018: Libel, Lies and Lawsuits – Queen Tut Exposed.....	23
May 9, 2018: The Webb of Lies and the Lying Liars Who Weave Them	24
November 10, 2018: Patriot’s Roundtable at Operation Classified Scott Bennett, Robyn Gritz, Sidney Powell & Kevin Shipp	33
October 28, 2018 featuring Lee Stranahan.....	15
September 15, 2017: U.S. Capitol Police Crime Scene Search Lab Take 2.....	25
Unknown 2019: Discovery CSI – David Hawkins Examines Sweigert’s Negligence in Ethical hacking.....	18

DOCUMENTS REFERENCED IN THIS DECLARATION

10/26/2018	49	MOTION FOR RULING TO SHOW CAUSE FOR DEFENDANT'S CONDUCT OF PROVIDING FALSE ADDRESS & PERSISTENT EFFORTS TO AVOID SERVICE. Document filed by Jason Goodman.(sc) (Entered: 10/29/2018)
11/09/2018	63	PLAINTIFF'S REPLY (Affirmation) of D. George Sweigert IN OPPOSITION TO "MOTION FOR RULING TO SHOW CAUSE FOR DEFENDANT'S CONDUCT OF PROVIDING FALSE ADDRESS & PERSISTENT EFFORTS TO AVOID SERVICE", re: 49 MOTION FOR RULING TO SHOW CAUSE FOR DEFENDANT'S CONDUCT OF PROVIDING FALSE ADDRESS & PERSISTENT EFFORTS TO AVOID SERVICE. Document filed by D George Sweigert. (sc) (Entered: 11/13/2018)
03/12/2021	225	PLAINTIFF'S FIRST RESPONSE TO ORDER ECF NO. 218, re: 218 Order, Set Deadlines/Hearings. Document filed by D George Sweigert. (sc) (Entered: 03/15/2021)
03/18/2021	230	PLAINTIFF'S SECOND RESPONSE TO ORDER ECF NO. 218, re: 218 Order, Set Deadlines/Hearings. Document filed by D George Sweigert. (sc) (Entered: 03/19/2021)
04/30/2021	267	LETTER addressed to Magistrate Judge Stewart D. Aaron from D. George Sweigert, dated 4/30/21 re: "DISCOVERY STATUS" - The following is provided as a status report to the current discovery issues. Unfortunately, the Plaintiff has gathered only a small percentage of the defamatory statements made by the defendant because Plaintiff has no access to video content posted at PATREON.COM and/or SUBSCRIBESTAR.COM by the defendant etc. In view of the foregoing, the plaintiff requests an advisory opinion of this Court that establishes the foundation for an adverse inference that the defendant has

		limited availabilitiy of discovery materials and has obstructed the discovery process etc. Document filed by D George Sweigert.(sc) (Entered: 04/30/2021)
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10/29/2021	321	REPORT AND RECOMMENDATIONS re: 302 MOTION for Summary Judgment. filed by Jason Goodman, 281 MOTION to Stay. filed by D George Sweigert, 293 MOTION for Hearing. filed by D George Sweigert, 304 MOTION to Strike. filed by D George Sweigert. For the foregoing reasons, I respectfully recommend that Defendants motion for summary judgment (ECF No. 302) be GRANTED IN PART and DENIED IN PART. I recommend that only Plaintiff's defamation claims based upon Statements 1 to 3 and 6 to 12 be dismissed. In addition, I recommend that Plaintiff's Rule 56(d) motion (ECF No. 281) be GRANTED so that Plaintiff may seek discovery regarding Defendants actual malice. Finally, I recommend that the other pending motions (ECF Nos. 293 and 304) be DENIED. The Clerk of Court is respectfully requested to mail a copy of this Report and Recommendation to the pro se parties. So Ordered. Objections to R&R due by 11/12/2021 (Signed by Magistrate Judge Stewart D. Aaron on 10/29/2021) (js) Transmission to Docket Assistant Clerk for processing. (Entered: 10/29/2021)
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“UNDISPUTED FACTS” MADE BY DEFENDANT IN ECF DOC. 280

STATEMENT NUMBER FOUR

Def's Item 75 (ECF 280). Defendant broadcasted a dozen videos that claimed the Plaintiff was part of illegal drug smuggling operation in Nicaragua. The context for this illegal drug smuggling was purportedly associated with the IRAN-CONTRA scandal. This imputes illegal activity upon the Plaintiff's reputation and should be considered a defamation *per se* statement, in the opinion of the Plaintiff.

As the Plaintiff is slandered in these videos, and they provide contextual background of the Defendant's smear campaign against the Plaintiff, these video podcast files should be given to the Plaintiff as part of discovery, in the Plaintiff's opinion.

This is not a matter of public concern.

You see, I think David is engaged in a crime. I have got the evidence for it. Could indicate involvement in a criminal operation of IRAN-CONTRA. Dave needs to be prosecuted. 18 USC 1001. I am going to make it my business to find a prosecutor to charge David Sweigert and his accomplices with that crime. Because I will see to it that that man is put in jail.	Statement no. 7 ECF no. 225
David Sweigert that I see evidence that he has committed felonies	Statement no. 8

ECF doc. 267 (above)

75. At the time Goodman made Statement #4, Sweigert was in a regular practice of making taunting videos, contacting local law enforcement, contacting Goodman's business associates, and otherwise harassing Goodman. **Goodman Decl. ¶ 51.**

76. Statement #4 is an accurate statement of Goodman's opinion. **Goodman Decl. ¶ 51.**

ECF doc. 280 (above)

3. The Defamatory Nature Of Statement 4 (From “The Trolls of Mount Shasta” Video) Cannot Be Assessed On The Present Record

Defendant refers to the following statements as Statement 4:

You see, I think David is engaged in a crime. I have got the evidence for it. Could indicate involvement in a criminal operation of IRAN-CONTRA. Dave needs to be prosecuted. 18 USC [§] 1001. I am going to make it my business to find a prosecutor to charge David Sweigert and his accomplices with that crime. Because I will see to it that that man is put in jail.

(Def.’s Mem. at 16.)

Plaintiff’s First Response indicates that what Defendant calls Statement 4 is a compilation of multiple statements made by Goodman during a YouTube video titled “The Trolls of Mount Shasta” that was posted on the Crowdsourcethe Truth2 YouTube channel. (See Pl.’s First Response at 12-13.) The link for the video included in Plaintiff’s First Response indicates that the video is not available. (See Pl.’s First Response at 14 (citing <https://youtu.be/qyg9YejHyok>).)


May ?, 2018: The Trolls of Mt. Shasta

ECF doc. 321 (above)

Other video evidence described below, indicates that the narrative that the Plaintiff was involved in “criminal operations” of INRAN-CONTRA. This video evidence should be given to the Plaintiff.

George Harry Sweigert was a radio operator in World War Two. Of course, his other son David Sweigert – who has relentlessly pursued you and I – uh, I may have mistakenly said the he was flying cocaine asa CIA contractor during the Iran-Contra scandal. It seems more likely that he was just operating the radios for the CIA contractors that were flying cocaine. [Goodman smiles]


ECF doc. 63 (above)



Hack to the Future – Exploring the Sweigert, Hearst, Buffett Time Phones with Quinn Michaels

10,494 views

392 162 SHARE SAVE ...

 **Crowdsource the Truth 2**
Streamed live on Apr 7, 2018

SUBSCRIBE 8.5K

George H. Sweigert (1920–1999) is widely credited as the first inventor to hold a patent for the invention of the cordless telephone. Why has Quinn Michaels dubbed this the "time phone" and how does it connect to William Randolph Hearst and Warren Buffett?

Become a Sponsor of Crowdsource the Truth

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Internet URL: <https://www.youtube.com/watch?v=r7IUIqVpOpg>

April 7, 2018 [04/07/2018]

And

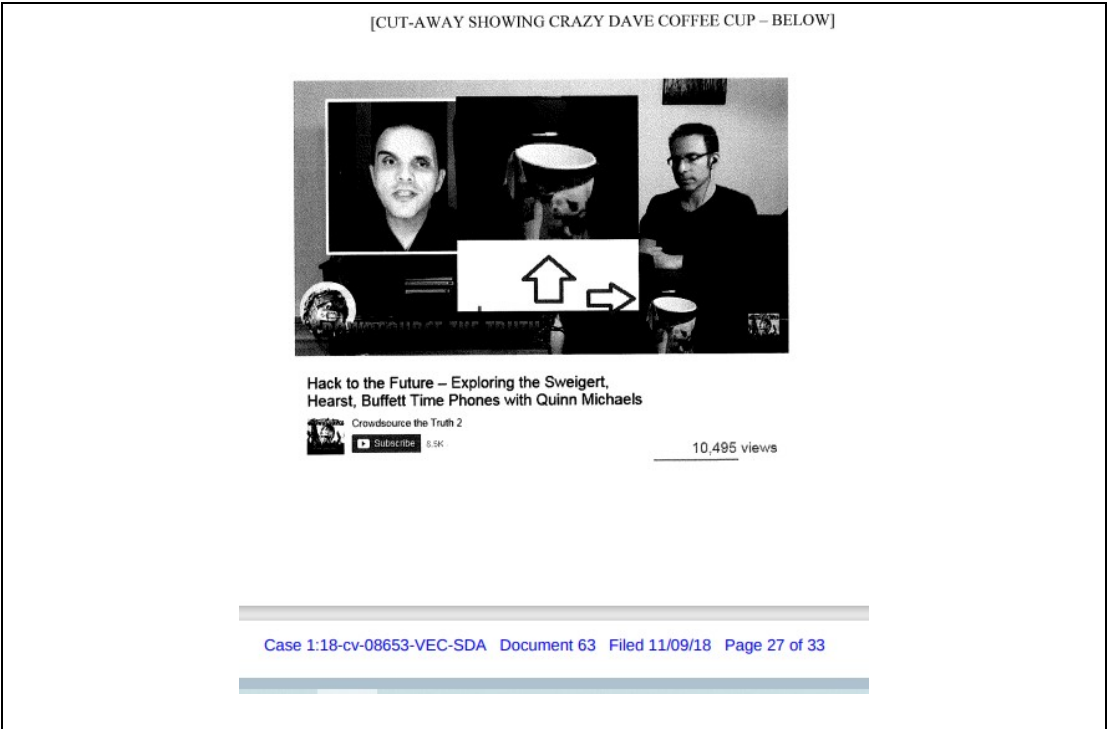
Internet URL: <https://www.youtube.com/watch?v=p5dl2PZpk5o>

May 6, 2018 [05/06/2018]

ECF doc. 63 (above)



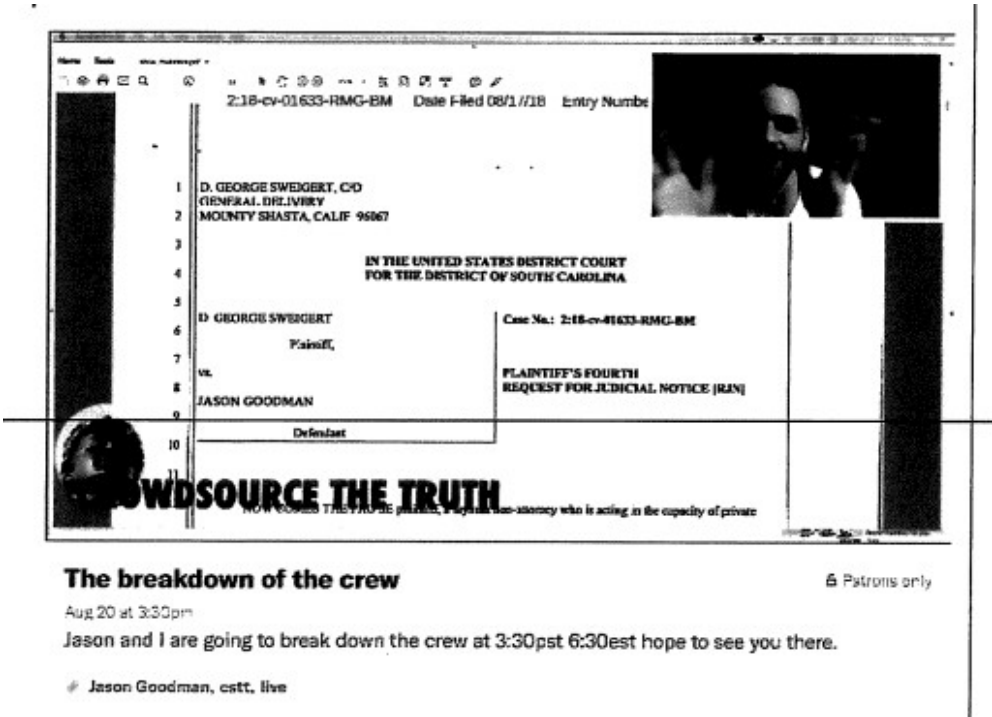
ECF doc. 63 (above)



ECF doc. 63 (above)

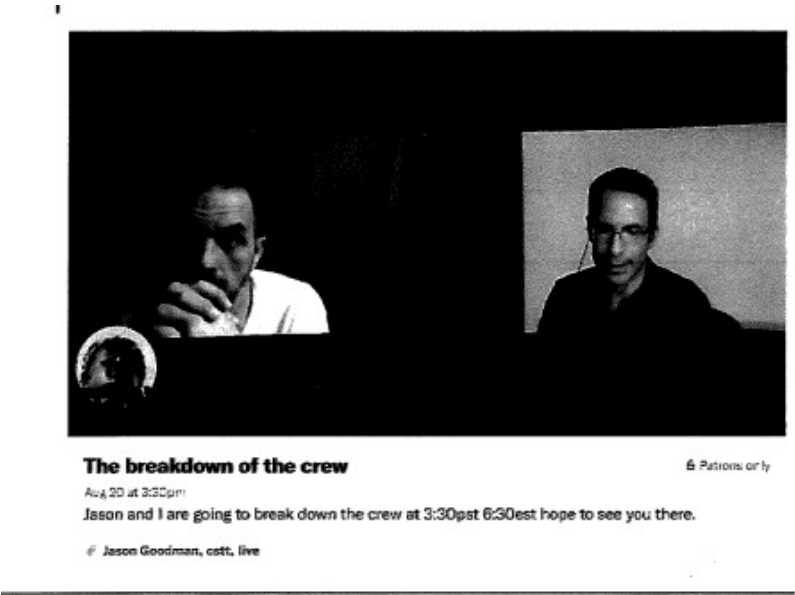
April 7, 2018: Hack to the Future – Exploring the Sweigert, Hearst, Buffett Time Phones

The Plaintiff has reason to believe that the Defendant discussed the so-called “criminal extortion network” with Quinn Michaels in the following depicted video.

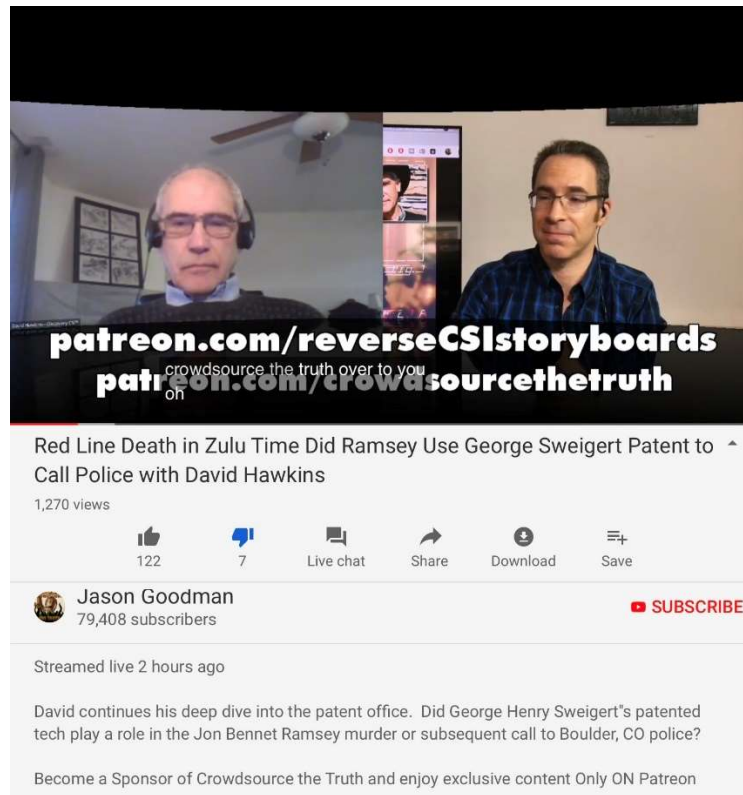


ECF doc. 14-1 (above)

August 17, 2018: The breakdown of the crew



ECF doc. 14-1 (above)



Date unknown 2019: Red Line Death in Zulu Time Did Ramsey Use George Sweigert Patent to Call Police with David Hawkins

This is not a matter of public concern.

STATEMENT NUMBER FIVE

Def's Item 78 (ECF 280). As shown below, Defendant discussed the Plaintiff in a video podcast with fellow Sputnik news affiliate Lee Stranahan. A very limited and partial transcript can be viewed to the right of the video screen shot. The number of such videos is believed to be about 8 – 10. Plaintiff does not have access to these videos which have been hidden from public access. Key circumstantial information is contained in these videos regarding comments made about the Plaintiff by Mr. Stranahan and the Defendant to include that the Plaintiff was committing mail fraud.

The Plaintiff does not possess copies of the video published: February 27, 2019 featuring David Hawkins, or the video published October 28, 2018 featuring Lee Stranahan.

At the time the Defendant made the statement (Statement no. 5) the Plaintiff had already added his name as an authorized recipient of mail at the Mesa, Arizona post office box immediately after the Thanksgiving holiday 2018. This fact was known to the Defendant who received a one-dollar postal money order mailed to the Defendant by the Plaintiff, shortly after Thanksgiving 2018.

The Defendant's concerns about mailing pleadings were addressed in ECF doc. 63 which included an Exhibit One to demonstrate Plaintiff was receiving Defendant's mail. This Exhibit demonstrates that between November 9, 2018 and February 27, 2019 the Defendant had no reason to believe that the Plaintiff was not an authorized use of the Mesa, Arizona mail box.

Further, Defendant published another video podcast on January 8, 2019 accusing the Plaintiff of mail fraud. The Plaintiff does not have a copy of this video (see ECF doc. 225).

This is not a matter of public concern.

David Sweigert – that I see evidence that he has committed felonies. And therefore, conspiring with him could expose you to serious legal issues if law enforcement chooses to act on the evidence that I am actively providing of these felonies. And conspiring with others around the Internet to break the law	Statement no. 8 ECF no. 230
He has now taken to basically threatening the federal judges in the	Statement no. 9

From ECF doc. 267 (above)

77. At the time Goodman made Statement #5, Sweigert was abusing the postal service in Mesa, Arizona. Specifically, Sweigert used an address owned by an individual named Mari Rapp. The U.S. Postal Service confirmed that they would not deliver to Sweigert at that address.

Goodman Decl. ¶ 51.

From ECF doc. 280 (above)

Defendant asserts that the statements comprising Statement 5 express his opinion that Sweigert committed mail fraud by using an address “owned” by someone else and committed fraud on the Court by filing this lawsuit. (Def.’s 56.1 Statement ¶¶ 77, 78; *see also* Def.’s Mem. at 17.) However, standing alone, these statements suggest that Goodman possessed evidence that Plaintiff committed felonies that he did not disclose to his audience. As with Statement 4, Defendant has not provided the Court with the video of the statements at issue for the Court to be able to assess “the full context of the communication in which the statement appears.” *Conti*, 2021 WL 1578047, at *4; *cf. Immuno AG. v. Moor-Jankowski*, 77 N.Y.2d 235, 250 (1991) (“It has

From ECF doc. 321 (above)

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SDNY
DOCUMENT
ELECTRONICALLY FILED
FILED: 10/26/18
IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

RECEIVED
SDNY PRO SE SECTION
OCT 26 PM 4:54
S.D. OF N.Y.

JURISDICTION

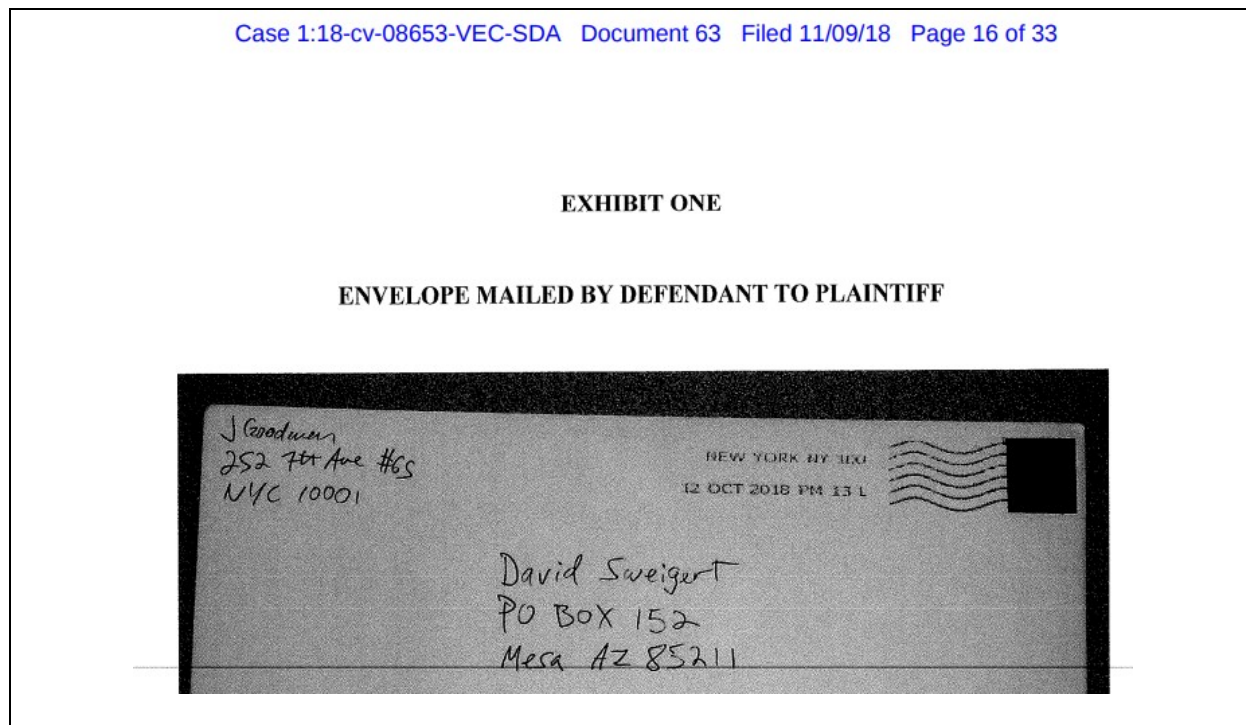
D. GEORGE SWEIGERT,
Plaintiff,
vs.
JASON GOODMAN,
Defendant

Case No.: 1:18-cv-08653-UA

MOTION FOR RULING TO SHOW CAUSE FOR
DEFENDANT'S CONDUCT OF PROVIDING FALSE
ADDRESS AND PERSISTENT EFFORTS TO AVOID
SERVICE

MOTION FOR RULING TO SHOW CAUSE FOR DEFENDANT'S CONDUCT OF PROVIDING FALSE
ADDRESS AND PERSISTENT EFFORTS TO AVOID SERVICE

ECF doc. 49 (above)



ECF doc. 63 (above)

Sweigert has got a lot to answer for.



Is Sweigert's current social engineering intended to distract from previous hacks?

https://www.youtube.com/watch?v=yx_6sj33FDs

ECF doc. 230 (above)

February 27, 2019: Does Sweigert's Social Engineering Spin the Bit Spread Spy in the Padlocked Bag with David Hawkins



Unknown 2019: Discovery CSI – David Hawkins Examines Sweigert's Negligence in Ethical hacking

----- Original Message -----

From: Spoliation Notice <spoliation-notice@mailbox.org>

To: stranahan@gmail.com, Spoliation Notice <spoliation-notice@mailbox.org>

Date: 10/27/2018 4:38 AM

Subject: Identification of witness per NY CPLR 3113 - Sweigert vs. Goodman

To: Lee Stranahan


As you are well aware, the attached screen shot of the CrowdSource The Truth (Jason Goodman) YouTube channel displays your image. During your discussion with Mr. Goodman at time mark 104:57 the topic of federal litigation was raised.

This is your notification pursuant to N.Y. C.P.L.R. Sec. 3113 that you could be called as a witness in this federal litigation (see attached). To that end, electronic evidence may be the subject of discovery. Therefore, you should take reasonable precautions to safeguard and safely archive communications exchanged between you and George Webb Sweigert and/or Jason Goodman. Such evidence includes text messages, Twitter tweets, e-mail messages, voice mails, YouTube private mail messages, Skype calls and/or messaging, etc.

If you require clarification as to your legal duties under such an evidence preservation notice (like this), please consult with appropriate legal counsel.

Warm regards,

Evidence Collection Team



#MAGA Bomber Goes Postal with Special Guest Lee Stranahan

1,853 views

152 15 SHARE SAVE

Jason Goodman
Streamed live 4 hours ago

SUBSCRIBE 68K

Transcript

64:54 lawsuits I've been answering lawsuits
64:57 from Dave Swigert we're gonna be doing
64:59 some more talking about that I was just
65:02 down at the 500 Pearl Street at the
65:07 federal court building submitting a
65:08 document it appears that Dave Swaggart
65:11 may not sure but there's evidence that
65:14 indicates that he may be submitting
65:18 fraudulent documents mail fraud this and
65:22 this is a thing I don't know much way

English (auto-generated)

Top chat replay

corysagaming The FBI is still controlled by the Deep State
RicoCoin Report Teresa you missed a big line on Laura

#MAGA Bomber Goes Postal with Special Guest Lee Stranahan

Transcript

64:54 lawsuits I've been answering lawsuits
64:57 from Dave Swigert we're gonna be doing
64:59 some more talking about that I was just
65:02 down at the 500 Pearl Street at the
65:07 federal court building submitting a
65:08 document it appears that Dave Swaggart
65:11 may not sure but there's evidence that
65:14 indicates that he may be submitting
65:18 fraudulent documents mail fraud this and
65:22 this is a thing I don't know much way

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EXHIBIT THREE

YouTube video production on the "Jason Goodman" channel

<https://www.youtube.com/watch?v=E3auCQb4o0A>

October 26, 2018 [10/26/2018]



ECF doc. 63

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*Statement no. 6
(Defendant to audience)*

Question for Legal Experts – Has D. George Sweigert Committed Mail Fraud?



Above: Defendant's video from the Mesa, Arizona Post Office displaying Plaintiff's likeness/photograph (cite: <https://www.youtube.com/watch?v=pmnscVpJJNQ>)

ECF doc. 225

January 29, 2019 Question for Legal Experts: Has D. George Sweigert Committed Mail Fraud?

STATEMENT NUMBER SEVEN

Def’s Item 81 (ECF 280). The Plaintiff believes that the Defendant uses the technique of conflating several actors, to include the undersigned, into some larger conspiracy. In this statement the Defendant, as believed by the Plaintiff, has accused several people of Internet telephone harassment crimes.

This is not a matter of public concern.

Southern District of New York, that is Valerie Caproni.	ECF no. 230
Shrouded in an organized campaign of harassment. Interstate harassment over the Internet, over the telephone. These are crimes people. So if you are engaged in doing that right now, Dean Fougere, Manuel Chavez, Robert David Steele, David Sweigert, Queen Tut Lutzke Holmes, whatever.	Statement no. 13 ECF no. 230
Has interfered with an officer of the court	Statement no. 16

ECF doc. 267

81. Statement #7 contains no statement of fact. Goodman Decl. ¶ 51.
82. Statement #7 is an accurate statement of Goodman’s opinion that Sweigert is engaged in illegal harassment. Goodman Decl. ¶ 51.

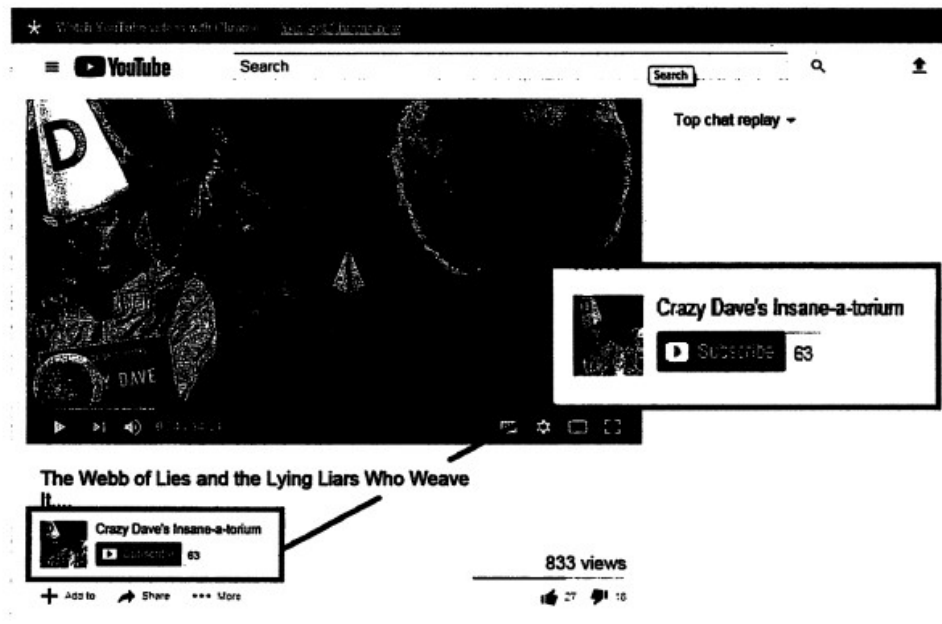
ECF doc. 280

6. **The Defamatory Nature Of Statement 7 (From Libel, Lies and Lawsuits Video) Cannot Be Assessed On The Present Record**

Defendant's Statement 7 includes the following statements: "[s]hrouded in an organized campaign of harassment. Interstate harassment over the Internet, over the telephone. These are crimes people. So if you are engaged in doing that right now, Dean Fougere, Manuel Chavez, Robert David Steele, David Sweigert, Queen Tut, Lutzke Holmes, whatever." (Pl.'s Second Response at 8.) These statements were made by Goodman in a YouTube video titled "Libel, Lies and Lawsuits – Queen Tut Evidence Exposed" posted on the Crowdsourcethe Truth YouTube channel on March 17, 2018. (Pl.'s Second Response at 8.) Goodman also posted a tweet promoting this video on Twitter. (See SAC at 27.) Goodman argues that these statements express Goodman's opinion that Plaintiff "is engaged in illegal harassment." (Def.'s Mem. at 17.)

May 17, 2018: Libel, Lies and Lawsuits – Queen Tut Exposed
ECF doc. 321 (above)

The Plaintiff has reason to believe that the Defendant discussed these alleged instances of alleged electronic harassment in greater detail in other companion video podcasts. They are listed below.

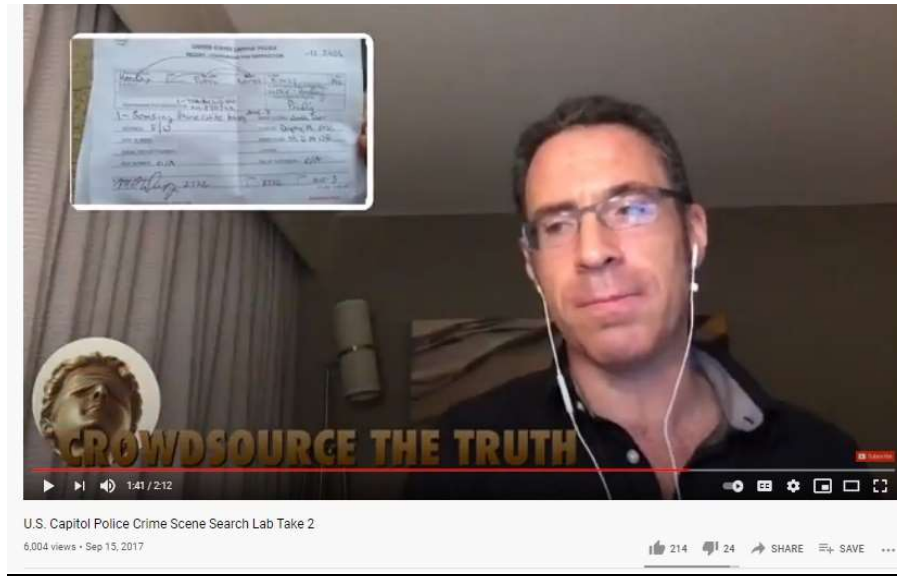


ECF doc. 8 (above)

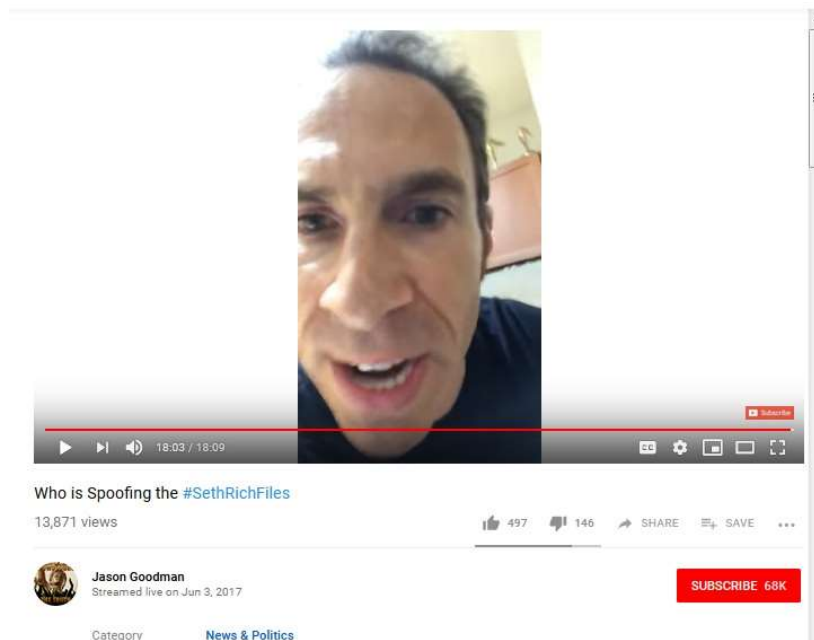
May 9, 2018: The Webb of Lies and the Lying Liars Who Weave Them



June 30, 2019: Robert David Steele's #FakeLawsuit Gets Its Day in Court



September 15, 2017: U.S. Capitol Police Crime Scene Search Lab Take 2



June 3, 2017: Who is Spoofing the #SethRichFiles

STATEMENT NUMBER EIGHT

Def's Item 83 (ECF 280). Defendant interviews Michael Barden on numerous videos in which he discusses the Plaintiff. The number of such videos is believed to be about 8 – 10. Plaintiff does not have access to these videos which have been hidden from public access. Key circumstantial information is contained in these videos regarding comments made about the Plaintiff by Mr. Barden and the Defendant to include that the Plaintiff was operating a criminal extortion ring.

This is not a matter of public concern.

He interfered with an officer of the court.	Statement no. 16 ECF no. 230
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From ECF doc. 267 (above)

83. When Goodman made Statement #8, he was commenting on Sweigert contacting the attorney representing an individual named Michael Barden in a criminal matter in Phoenix, AZ to create discord between lawyer and client. **Goodman Decl. ¶ 51.**

84. Statement #8 contains no defamatory statement. **Goodman Decl. ¶ 51.**

From ECF doc. 280 (above)

7. The Defamatory Nature Of Statement 8 (From Michael Barden Video) Cannot Be Assessed On The Present Record

Statement 8, “He interfered with an officer of the court,” was made by Goodman during a YouTube video titled “Michael Barden Targeted individual” posted on the Crowdsourcethe Truth YouTube channel. (Pl.’s Second Response at 12.) Defendant argues that there is nothing defamatory about this statement. (Def.’s Mem. at 17.) The statement was part of a conversation between Goodman and Barden in which they were discussing a legal action involving Barden. (See Pl.’s Second Response at 12.) In his declaration, Goodman states that the comment was in response to Plaintiff contacting the attorney representing Barden in a criminal matter “in an effort to create discord between lawyer and client,” which Goodman “considered inappropriate.”

ECF doc 321 (above)



January 29, 2019: Michael Barden Targeted Individual – Results of Michael’s Sentencing Hearing On the Courthouse Steps.

PUBLIC ARTIFACTS SECTION TWO:

Defendant Jason Goodman chats in the YouTube.Com video Live Stream entitled "Michael Barden Targeted Individual – Psychological Assault and Weaponized Mental Health Evaluation". Internet URL:

<https://www.youtube.com/watch?v=anJMtPhp4pI&t=838s>

At 16:00 Barden explains he has a meeting with Judge Susan Brnovich.

At 17:32 Judge Brnovich's photo is displayed to the audience by Defendant Goodman



PUBLIC ARTIFACT TWO:

Defendant Jason Goodman displays photo of Judge Susan Brnovich in the YouTube.Com video Live Stream entitled "Michael Barden Targeted Individual – Psychological Assault and Weaponized Mental Health Evaluation". Internet URL: <https://www.youtube.com/watch?v=anJMtPhp4pI&t=838s>

From ECF doc. 32 (above)

Date unknown. Michael Barden Targeted Individual

7. In a follow-up video posted on January 9, 2019 you again repeat the insinuation of mail fraud and communication with the postal inspection service (URL: <https://www.youtube.com/watch?v=Mul5QkEgHMA>). The following text appears in the video description:

Michael Barden Targeted Individual – How to Survive an Economic Attack Intended to Disrupt Income
Streamed live on Jan 9, 2019
Targeted Individuals must think outside the box in devising tactics for economic survival.

Support Michael on Patreon – patreon.com/MichaelJBarden
or Buy a hat from Hats Around the World on eBay – ebay.com/str/Hatsaroundtheworld/



Michael Barden Targeted Individual – How to Survive an Economic Attack Intended to Disrupt Income

January 9, 2019: Michael Barden Targeted Individual – How to Survive an Economic Attack Designed to Disrupt Your Income

Live chat replay

26:34 Peter Maguire go over and beat his a**

29:42 Woke Bomb #CitizenMurderPlot

Michael Barden Targeted Individual – How to Survive an Economic Attack Intended to Disrupt Income

819 views

82 9 Live chat Share Download Save

Jason Goodman 78K subscribers SUBSCRIBE

Comments 10

Add a public comment...

Marisa Drake • 52 minutes ago

STATEMENT NUMBER TEN

Def’s Item 87 (ECF 280). As discussed on the Nathan Stolpman, Lift the Veil show, April 4, 2018, the Defendant discussed approaches to interact with the Federal Bureau of Investigation (F.B.I.) with former disgruntled F.B.I. Special Agent Robyn Gritz. The Defendant made several videos with Robyn Gritz during this period. The number of such videos is believed to be about 8 – 10.

This is not a matter of public concern.

You are engaged in an organized criminal harassment campaign. I have submitted my evidence against you to the NY FBI field office.	ECF no. 230 Statement no. 21 ECF no. 230
--	--

ECF no. 267 (above)

87. Statement #10 was a true statement, as Goodman was in contact with the FBI at this time. Goodman Decl. ¶ 51.

ECF no. 280 (above)

9. Statement 10 (From March 30, 2018 Email) Is Not Actionable

Statement 10, “You are engaged in an organized criminal harassment campaign. . . I have submitted my evidence against you to the NY FBI field office,” consists of excerpts from a March 30, 2018 email from Goodman to Sweigert and others. (Pl.’s Second Response at 19; *see also* SAC at 36.) I find that the first portion of Statement 10, “[y]ou are engaged in an organized criminal harassment campaign,” is a nonactionable opinion. The immediate context of the statements reads as follows: “You are hurting yourself by generating a growing collection of evidence that indicates very strongly that you are engaged in an organized criminal harassment campaign against me personally as well as other serious potentially criminal offenses.” (SAC at 36.) The

ECXF doc. 321 (above)

Issues with Robyn Gritz

Robyn Gritz discussed her so-called F.B.I. investigative techniques that were purported used to help the Defendant prepare his materials for the F.B.I. indicating that the Plaintiff was engaged in criminal activity. At an event known as “Operation Classified”, November 10, 2018, (**ECF doc. 66**) she participated in such discussions to the Plaintiff’s best understanding and belief.



Above Robyn Gritz third-party video (not requested, provided for informational purposes)

Defendant also discussed his contacts that had deep connections to law enforcement which included “True Pundit” aka Thomas Paine, aka Michael D. Moore of West Chest, Pennsylvania. The Plaintiff believes that the Defendant was providing an exaggerated *curriculum vitae* of “True Pundit” to develop the credibility of the persons supposedly helping the Defendant collect information about the Plaintiff. As show in exhibits below (**ECF doc. 26-1**) “True Pundit” had no connections with law enforcement or the F.B.I. and Defendant’s statements about “True Pundit’s” background is questionable, in the Plaintiff’s opinion. Video evidence, in possession of the Defendant, will develop this information more clearly of it is released as discovery.

Both Gritz and Paine were cited by the Defendant on the “Lift the Veil” show as contacts that helped the Defendant fashion his response to contact the F.B.I. about the Plaintiff.

Plaintiff does not have access to these videos which have been hidden from public access. Key circumstantial information is contained in these videos regarding comments made about the

F.B.I. and investigative techniques to the Defendant to include that the Plaintiff was operating a criminal extortion ring.



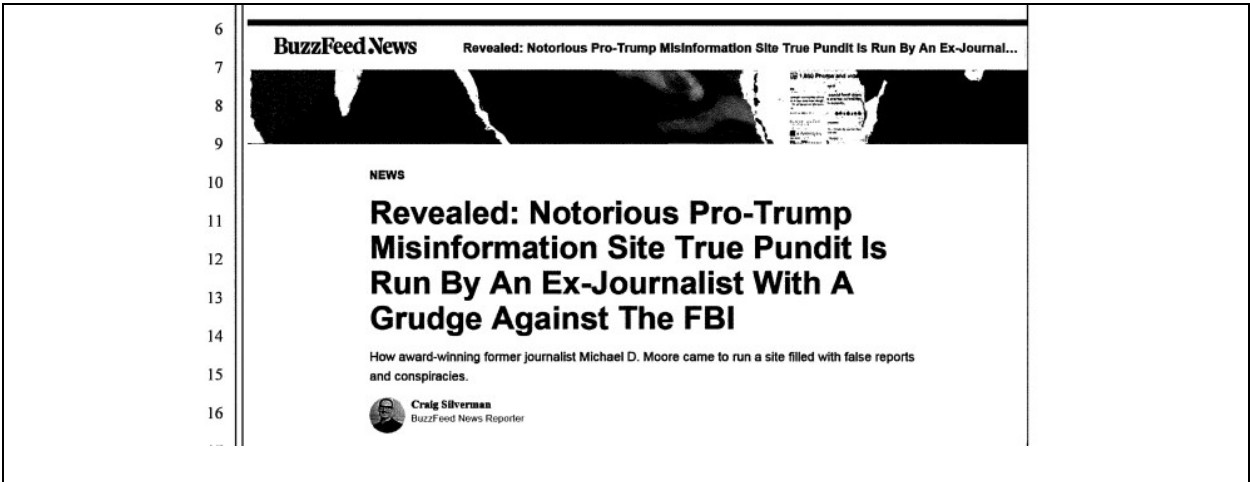
ECF doc. 66 (above)

November 10, 2018: Patriot's Roundtable at Operation Classified Scott Bennett, Robyn Gritz, Sidney Powell & Kevin Shipp



May 17, 2018: Larry Klayman on Mueller’s Conflicts of Interest with Special Guest Robyn Gritz

Issues with Michaels D. Moore




ECF doc. 26-1

"True Pundit has carved out a unique niche among the news grifters capitalizing on our conspiracy-laden, deeply polarized information environment."


ECF doc. 26-1

One of Paine's 2016 stories even led to an email exchange between then-FBI director James Comey and his former deputy, Andrew McCabe, about whether True Pundit really had sources inside the FBI. Paine, of course, seized upon that as evidence that he's as well-sourced as he claims. (He loves to criticize the bureau: The site has used the phrase "Federal Bureau of Incompetence" in the headline of five different stories.)

ECF doc. 26-1

To get answers, BuzzFeed News investigated Paine and True Pundit's social media accounts, business and court records, and other publicly available information. They reveal that Thomas Paine is in fact Michael D. Moore, 51, a Pennsylvania man with a background in journalism, a criminal record as a result of an FBI investigation, and a long history of shady and illegal business practices. 

ECF doc. 26-1

on the equipment he used to pirate hockey games and other content. 

Moore pleaded guilty to one count of copyright infringement in June 2013. He was sentenced to time served of one day in prison, a year of house arrest, and three years of supervised release. During his release he had to provide monthly income statements and facilitate the "investigation of his financial dealings," according to a sentencing document filed on June 17, 2013.

ECF doc. 26-1

STATEMENT NUMBER NINE

Def's Item 85 (ECF 280). The Plaintiff believes that a series of videos produced by the Defendant will demonstrate the Defendant stated that threats of violence and other serious threats were made against the Defendant by the Plaintiff. The Plaintiff believes that these statements about threats are not true and represent more connotation of criminality directed at the Plaintiff.

This is not a matter of public concern.

George's brother who is making public threats against us.	Statement no. 18 ECF no. 230
Van was accused in an organized criminal harassment campaign. I have	Statement no. 21

ECF doc. 267 (above)

85. Statement #9 is true. Sweigert regularly issues threats, including threatening Judge Caproni. **Goodman Decl. ¶ 51.**

ECF doc. 280 (above)

8. The Defamatory Nature Of Statement 9 (From Clear and Present Danger Video) Cannot Be Assessed On The Present Record

Statement 9, “George’s brother [Plaintiff] who is making public threats against us,” was part of a YouTube video titled “Clear and Present Danger” streamed on the Crowdsourcethe Truth YouTube channel on June 14, 2017.⁷ (Pl.’s Second Response at 14; *see also* Pl.’s Counterstatement ¶ 128.) Defendant argues that this statement is not defamatory because it is true and “Sweigert issues threats almost daily, including threatening Judge Caproni.” (Def.’s Mem. at 17.) Again, Defendant did not include this video as part of the summary judgment record and it is marked private. (See Pl.’s Second Response at 14 (citing <https://www.youtube.com/watch?v=ekr5cw2WAbU&t=7612s>).) Thus, the Court cannot determine who “us” refers to, let alone determine whether the statement is substantially true, as Defendant argues. For these reasons, the Court is unable to determine whether Statement 9 is actionable. In any event, even if Statement 9 is actionable, as set forth in Discussion Section

June 14, 2017: Clear and Present Danger

ECF doc. 321 (above)



June 13, 2017: Live From the Capitol Building

Signed this twenty ninth day of December 2021. Date 12/29/2021.

Respectfully,

A handwritten signature in black ink, appearing to read 'D. Sweigert', with a stylized flourish at the end.

D. George Sweigert
Veteran U.S. Air Force

CERTIFICATE OF SERVICE

The Plaintiff asserts under penalties of perjury
that copies of these pleadings have been sent to
Jason Goodman on 12/29/2021 at
truth@crowdsourcethetruth.org